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15 Attorneys for Plaintiff Google Inc.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 OAKLAND DIVISION
 19

20 GOOGLE INC.,
 21 Plaintiff,

22 v.

23 ROCKSTAR CONSORTIUM US LP and
 24 MOBILESTAR TECHNOLOGIES LLC,

25 Defendants.

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Attorneys for Defendants Rockstar Consortium
 U.S. LP and MobileStar Technologies LLC

CASE NO. 13-cv-5933-CW

UNOPPOSED MOTION TO STAY CASE

1 Defendants Rockstar Consortium US LP and MobileStar Technologies LLC (“Rockstar”)
2 request that the Court order that all deadlines in this case be stayed 45 days. Active discussions
3 are underway that may settle all issues in dispute. The requested stay will facilitate those active
4 discussions. A 45-day stay is warranted due to the complexity of the transaction being discussed.
5 Accordingly, Rockstar requests that the Court stay all deadlines until January 5, 2015. The Eastern
6 District of Texas and the District of Delaware, which are overseeing cases involving Rockstar
7 Consortium US LP, Netstar Technologies LLC, and Bockstar Technologies LLC, have entered
8 similar orders on request of the parties.¹

9 In the event the stay is lifted, the Parties agree to work together in good faith to submit a
10 proposed revised case schedule.

11 Google does not oppose this request for a stay, provided that all dates in the current case
12 schedule are moved by at least 45 days, to account for the impact of the stay on the current case
13 schedule. Google believes that the requested 45-day stay should not be entered without
14 corresponding adjustments to upcoming case deadlines, including the close of fact discovery.
15 Without such an adjustment Google would be unfairly prejudiced if the stay is lifted and the case
16 is then litigated on the current schedule. Thus, it is Google’s position that, should the stay be
17 granted, all remaining dates should be either vacated or moved by at least 45 days.

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¹ See *Rockstar Consortium US LP, et al. v. Google Inc.*, Case No. 2:13-cv-00893-JRG-RSP, dkt. 289 (EDTX, November 19, 2014) attached as Exhibit A and *Bockstar Technologies LLC, v. Cisco Systems, Inc.*, Case No. 1:13-cv-2020-SLR-SRF (D.Del., November 17, 2014) attached as Exhibit B.

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DATED: November 21, 2014

Respectfully submitted,
QUINN EMANUEL URQUHART & SULLIVAN, LLP
By /s/ Patrick D. Curran
Patrick D. Curran
Attorneys for Google Inc.

McKOOL SMITH HENNIGAN, P.C.
By /s/ Josh W. Budwin
Joshua W. Budwin
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on November 21, 2014, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile, U.S. Mail and/or overnight delivery.

/s/ Josh W. Budwin
Josh W. Budwin